

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

SEP 19 2013

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No.
)
MICHAEL EARL BROOM, JR.,)
)
Defendant.)

4:13CR374 JAR/DDN

INDICTMENT

COUNT ONE

The Grand Jury charges that:

On or about July 30, 2013, in the City of Saint Louis, within the Eastern District of Missouri,

MICHAEL EARL BROOM, JR.,

the Defendant herein, did knowingly possess, with the intent to distribute, an amount of heroin, a schedule I controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT TWO

The Grand Jury further charges that:

On or about July 30, 2013, in the City of Saint Louis, within the Eastern District of Missouri,

MICHAEL EARL BROOM, JR.,

the Defendant herein, being an unlawful user of one or more controlled substances, did knowingly possess one or more firearms, said firearms having previously traveled in interstate or foreign commerce.

In violation of Title 18, United States Code, Section 922(g)(3).

COUNT THREE

The Grand Jury further charges that:

On or about July 30, 2013, in the City of Saint Louis, within the Eastern District of Missouri,

MICHAEL EARL BROOM, JR.,

the Defendant herein, did knowingly possess one or more firearms, in furtherance of the drug trafficking crime charged in Count One above.

In violation of Title 18, United States Code, Section 924(c)(1)(A), and punishable pursuant to Title 18, United States Code, Section 924(c)(1)(A)(i).

A TRUE BILL.

FOREPERSON

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